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**BY ECF**

Hon. Vera M. Scanlon  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Rayne Valentine v. City of New York, et al., 21-CV-4867 (EK) (VMS)

Your Honor:

I am co-counsel for Plaintiff Rayne Valentine in the above-captioned matter. I write in response to Defendants' June 28, 2023 application for an additional more than two weeks – until July 14, 2023 - within which to respond to Plaintiff's revised settlement demand (ECF 63).

Notably, the first we learned of the proposed application was when it hit the docket. Defense counsel contacted us about another matter related to the case earlier this week. However, defense counsel did not give us any notice of their proposed application, or discuss it with us, before filing.

Although Defendant's application does not therefore include Plaintiff's consent or position on the application, as required Section II(b)(3) of this Court's rules, Plaintiff nevertheless consents to Defendants' request for additional time to respond to Plaintiff's revised settlement demand, in the hopes of continuing the parties' exploration of potential settlement.

Separately, but also related to this case, Plaintiff's counsel will submit a letter tomorrow in addressing Defendants' failure to comply with the Court's June 14, 2023 Order (ECF 62), as well as their untimely Rule 72 objections (ECF 64) and application for a stay (ECF 65) related to that Order, and seeking an extension of the current July 5, 2023 deadline by which Plaintiff must amend the Complaint.

Respectfully submitted,

/S/

Gideon Orion Oliver